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**From:** McNally, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EFA5514317E34B9895687D73730FDDE9-ROBERT MCNALLY]  
**Sent:** 4/16/2018 6:13:36 PM  
**To:** Jones, Russell [Jones.Russell@epa.gov]  
**CC:** Overstreet, Anne [overstreet.anne@epa.gov]; Leahy, John [Leahy.John@epa.gov]  
**Subject:** RE: Plant Biostimulants Guidance Update

**Importance:** High

Russ,

For each office, can you tell me why they may not concur:

- OECA
- OGC
- etc

Also, what comments we took from each group and ones we did not, and why. I recollect that we did not take style changes or how to organize the paper, since those are not substantive changes, but we had a handful of OECA comments we did not take that may have been substantive.

When will TJ be done? I think his piece is pretty short as I recall.

That is one step that we can plot out --- what are the other ones in the schedule to get us to Late June?

For a call with all the affected parties, might be good to have a table that lists all the groups we have asked for comment and concurrence:

- OECA
  - OGC
  - OP
  - ORD
  - Region 1
  - Region 2
- 
- Region 10

It would be good to have all of the Regions either "Concur, No comment", or "concur, limited comments accepted" so it highlights who is;/are the holdouts. Having said that, I need to see who are the holdouts and why.

Thanks

Bob

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**From:** Jones, Russell  
**Sent:** Monday, April 16, 2018 1:01 PM  
**To:** McNally, Robert <McNally.Robert@epa.gov>

**Cc:** Overstreet, Anne <overstreet.anne@epa.gov>; Leahy, John <Leahy.John@epa.gov>

**Subject:** RE: Plant Biostimulants Guidance Update

Bob:

Ryne informs me that, at the earliest, the FAR will be in late June/early July. He will be finalizing draft of the FRN and the accompanying action memo, which will need BPPD's review and concurrence. He also stated that once BBPD has reviewed and concurred, that it would be a good idea to touch base with OECA, OP, ORD, OGC before moving it forward once we get TJ's piece.

He really recommends that we at least let them know what our plans are before we go to FAR. His feeling was that they could all easily non-concur because we didn't work with them and then we would be right back to square one. He strongly recommends that we should do this out of courtesy, that's it's probably not too much to ask.

Ryne said he would start making calls to see how they'd respond based on our efforts to reach out to the regions, but I think they'll at least want to see our drafts.

We will both defer to you on how to proceed.

Russ

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**From:** Jones, Russell

**Sent:** Monday, April 16, 2018 12:45 PM

**To:** McNally, Robert <McNally.Robert@epa.gov>

**Cc:** Overstreet, Anne <overstreet.anne@epa.gov>; Leahy, John <Leahy.John@epa.gov>

**Subject:** RE: Plant Biostimulants Guidance Update

All positive responses. I just deleted a few claims that seemed to overlap with some of our plant regulator claims in Table 3, and clarified a few others with some wordsmithing in some earlier versions in response to Helene Ambrosino comments. Nothing substantive. Yes the one strikeout was one I did today.

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**From:** McNally, Robert

**Sent:** Monday, April 16, 2018 12:40 PM

**To:** Jones, Russell <Jones.Russell@epa.gov>

**Cc:** Overstreet, Anne <overstreet.anne@epa.gov>; Leahy, John <Leahy.John@epa.gov>

**Subject:** RE: Plant Biostimulants Guidance Update

What were the comments from the Region? Just the one strike out in the table?

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**From:** Jones, Russell

**Sent:** Monday, April 16, 2018 12:32 PM

**To:** McNally, Robert <McNally.Robert@epa.gov>

**Cc:** Overstreet, Anne <overstreet.anne@epa.gov>

**Subject:** Plant Biostimulants Guidance Update

Bob:

Attached is the latest and greatest. It incorporates some administrative paragraphs added by Ryne as well as any substantive comments from the Regions (which was not very much). There is an Empty Header (Cost Savings) on page 9, where TJ will put his piece.

I am working with Ryne on next steps and scheduling for the FAR.

## Russ

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